

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Sahadeo Singh	:	
580 Sunnemeade Avenue	:	
Warminster, PA 18974	:	
Plaintiff	:	
Vs.	:	Civil Action-Law
Experian Information Solutions, Inc.	:	
475 Anton Blvd.	:	
Costa Mesa, CA, 92626	:	
and	:	
Experian Information Solutions, Inc.,	:	13-cv-07651
5 Century Drive	:	
Parispany, NJ 07054,	:	
and	:	
Search America, Inc.	:	
6450 Wedgewood Road, Suite 100	:	
Maple Grove, MN 55311	:	
and	:	
X,Y,Z Corporations	:	
Defendant(s)	:	

**PLAINTIFF'S FIRST AMENDED COMPLAINT**

1. This is a lawsuit for alleged violations of the Fair Credit Reporting Act (FCRA), and the Fair and Accurate Credit Transaction Act (FACTA), 15 U.S.C. 1681, et seq.
2. Venue is proper in this District because Defendant(s) do(es) business in this jurisdiction and avails itself of the benefits of the market in this jurisdiction.
3. Venue is proper in this District because witnesses are located at or near this jurisdiction.
4. Venue is proper in this jurisdiction because a substantial portion of the transaction(s), occurrence(s), act(s) or omission(s) took place in this jurisdiction.
5. Venue is proper in this District because Plaintiff resides in this jurisdiction.

## **PARTIES**

6. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.
7. Plaintiff is Sahadeo Singh, an adult individual with a mailing address of 580 Sunnemeade Avenue, Warminster, PA 18974.
8. Defendants are the following individuals and business entities.
  - a. Experian Information Solutions, Inc., a corporation with an address including but not limited to 475 Anton Blvd., Costa Mesa, CA, 92626.
  - b. Experian Information Solutions, Inc., a corporation with an address including but not limited to 5 Century Drive, Parsippany, NJ 07054.
  - c. Search America, Inc. a business entity with an address including but not limited to 6450 Wedgewood Road, Suite 100, Maple Grove, MN 55311.
  - d. X,Y,Z Corporations, business entities whose identities are not known to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such entities played a substantial role in the commission of the acts described in this complaint.

**COUNT ONE:**

**Sahadeo Singh v. Experian Information Solutions, Inc., Search America, Inc.  
Violation FCRA and FACTA, 15 USC 1681 et. seq.  
Failure to Provide Address and Telephone Number of Abington Memorial Hospital**

9. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.
10. At all times mentioned herein Plaintiff was a consumer as defined by 15 USC 1681a et. seq.
11. At all times mentioned herein Plaintiff was a person as defined by 15 USC 1681a (c).
12. At all times mentioned herein Plaintiff was an individual as defined by 15 USC 1681a (c) et. seq.
13. At all times mentioned in this Complaint, Defendant(s) maintained a “consumer report” on Plaintiff as defined by 15 USC 1681(a)(d) et. seq.
14. At all times mentioned in this Complaint, all of the Defendant(s) were a “consumer Reporting Agency” (CRA) as defined by 15 USC 1681a(f) et. seq.
15. In the alternative, if any of the named defendants is found not to be a consumer reporting agency, then the remaining defendant(s) may still be found to be a consumer reporting agency.
16. At all times mentioned in this Complaint, all of the Defendant(s) were a “person” as defined by 15 USC 1681a(f) et. seq.

17. Plaintiff's Experian Information Solutions, Inc. consumer report contained the names and addresses of several business entities that had accessed Plaintiff's consumer report in the last 12 months.
18. At various dates and times depicted in the attached exhibits, Defendants Experian Information Solutions, Inc. and Search America, Inc. acted jointly and in concert to provide Plaintiff's consumer report to Abington Memorial Hospital.
19. According to 15 USC 1681g(a)(3), CRA is required to disclose to the consumer the names of all persons or business entities that accessed the consumer's report within the last 12 months of the date of the report.
20. In addition to the requirement to disclose the names of all persons or business entities that accessed the consumer's report, pursuant to 15 USC 1681g (a)(3), the CRA is also required to provide the telephone number and address for the persons or business entities that accessed the consumer's report in the last 12 months, upon written request of the consumer to disclose such telephone number(s).
21. Plaintiff sent written requests to Defendant Experian Information Solutions, Inc. for the address and telephone number for Abington Memorial Hospital. Such requests were received by Defendant Experian Information Solutions.

22. Plaintiff sent written requests to Defendant Search America, Inc. for the address and telephone number for Abington Memorial Hospital. Such requests were received by Defendant Experian Health d/b/a Search America.

23. By refusing to disclose to Plaintiff's the address for Abington Memorial Hospital, Defendant Experian Information Solutions, Inc. violated 15 USC 1681g(a)(3) of the FCRA.

24. By refusing to disclose to Plaintiff's the address for Abington Memorial Hospital, Defendant Search America, Inc. violated 15 USC 1681g(a)(3) of the FCRA.

## **LIABILITY AND DAMAGES**

25. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.
26. Defendant(s) is liable for the acts committed by its agents under the doctrine of respondeat superior because Defendant's agents were acting within the scope of their employment with Defendant.
27. In the alternative, Defendant(s) is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents / employees were engaged in a joint venture and were acting jointly and in concert.
28. At all times mentioned in Count One of this Complaint Defendants Experian Information Services, Inc. and Search America, Inc. were acting jointly and in concert, and therefore they are jointly and severally liable for the misconduct described in Count One.
29. Any mistake made by Defendant(s) would have included a mistake of law.
30. Any mistake made by Defendant(s) would not have been a reasonable or bona fide mistake.

31. Plaintiff believes and avers that Defendant's conduct was willful for reasons including but not limited to the following.

- a. The number of requests for the address and telephone number for Saint Luke's Hospital made by Plaintiff which were ignored by Defendant(s).
- b. The number of similarly situated consumers whose rights under 15 USC 1681g(a)(3) et .seq. were violated by Defendant(s) in a similar manner in which Plaintiff's rights were violated.
- c. It is believed and averred that Defendant(s)' act and omissions were caused by Defendant(s)' standard business practices, policies and procedures antithetical to Defendant(s) duties to provide telephone numbers pursuant to 15 USC 1692g(a)(3) et. seq.

32. Plaintiff believes and aver that Plaintiff is entitled to at least \$1.00 actual damages for Plaintiff, including but not limited to phone, fax, stationary, postage, etc.

33. Plaintiff believes and aver that Plaintiff is entitled to \$1,000.00 statutory damages pursuant to 15 USC 1681 et. seq.

34. Because Defendant(s)' conduct was willful, Plaintiff requests punitive damages in an amount to be determined by this Honorable Court.

35. For purposes of a default judgment, Plaintiff believes and avers that the amount of such punitive damages should be no less than \$150,000.00.



### ATTORNEY FEES

36. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.

37. Plaintiff is entitled to reasonable attorney fees pursuant to 15 USC 1681 et. seq.

38. It is believed and averred that such reasonable attorney fees amount to no less than \$2,800.00 at a reasonable rate of \$350.00 per hour, enumerated below.

a. Consultations with client, review of file, preparing letters	2
b. Drafting, editing, review, filing of complaint, and service of , amended Complaint and related documents	3
c. Drafting, editing and serving discovery on defense	1
d. Follow up contact with Defense and Plaintiff	2

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$$8 \times \$350 = \$2,800.00$$

39. Plaintiff's attorney fees continue to accrue as the case move forward.

40. The above stated attorney fees are for prosecuting this matter and reasonable follow up.

**OTHER RELIEF**

41. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.
42. Plaintiff requests a jury trial in this matter.
43. Plaintiff demands a jury trial in this matter.
44. Plaintiff demands fees for prosecuting this action.
45. Plaintiff demands costs for prosecuting this action.
46. Plaintiff seeks such other relief as this Honorable Court may deem just and proper.

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of no less than 153,801.00.

\$1.00 more or less actual damages against all Defendants.

\$1,000.00 statutory damages pursuant to 15 USC 1681 et. seq.

\$2,800.00 attorney fees

\$150,000.00 punitive damages

---

\$153,801.00

Plaintiff demands fees and costs associated with prosecuting this action. Plaintiff seeks such additional relief as the Court deems just and proper.

Vicki Piontek 1-1-2014  
Vicki Piontek, Esquire Date  
Attorney for Plaintiff  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617  
palaw@justice.com  
Fax: 866-408-6735

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974  
215 [REDACTED]

Experian Healthcare  
Attention: Compliance  
6450 Wedgewood Road, Suite 100  
Maple Grove, MN 55311

Re. Sahadeo Singh SSN: [REDACTED] DOB [REDACTED]

To Whom it May Concern:

I would like to request a free copy of all information that your company has about me.

I would like to know that persons or business entities have obtained my information from your company in the last 12 months. To whom did you furnish my personal information in the last 12 months? I would like names, addresses and telephone numbers.

Enclosed please find a copy of my drivers license identification, and other documentation of my identity and my address.

**Please redact the first five digits of my Social Security number on my consumer report.**  
**Please do not print the first five digits of my Social Security number on my consumer report.**

Thank you.

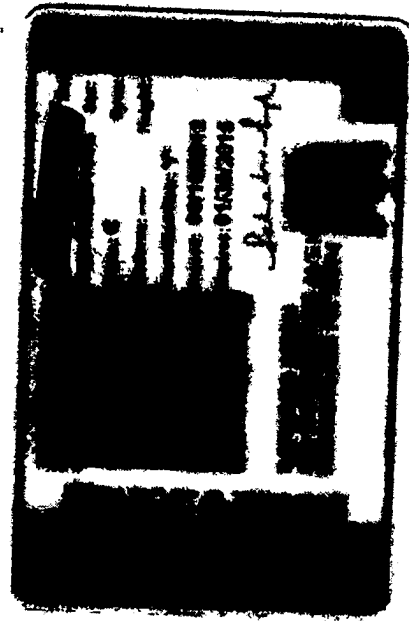
Sincerely,

Sahadeo Singh  
Sahadeo Singh

06-25-13  
Date

Exhibit

A-1



Exhibit

A-2

# United States Bankruptcy Court

Eastern District of Pennsylvania

Case No. 13-10625-mdc

Chapter 7

In re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974

Social Security No.:  
xxx-xx-2662

Employer's Tax I.D. No.:

## DISCHARGE OF DEBTOR

It appearing that the debtor is entitled to a discharge,

### IT IS ORDERED:

The debtor is granted a discharge under section 727 of title 11, United States Code, (the Bankruptcy Code).

BY THE COURT

Dated: 5/7/13

Magdeline D. Coleman  
United States Bankruptcy Judge

**SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION.**

Exhibit

A-3

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974  
215 [REDACTED]

Search America  
6450 Wedgewood Road, Suite 100  
Maple Grove, MN 55311

Re. Sahadeo Singh SSN: [REDACTED] DOB [REDACTED]

To Whom it May Concern:

I would like to request a free copy of all information that your company has about me.

I would like to know that persons or business entities have obtained my information from your company in the last 12 months. To whom did you furnish my personal information in the last 12 months? I would like names, addresses and telephone numbers.

Enclosed please find a copy of my drivers license identification, and other documentation of my identity and my address.

**Please redact the first five digits of my Social Security number on my consumer report.  
Please do not print the first five digits of my Social Security number on my consumer report.**

Thank you.

Sincerely,

Sahadeo Singh  
Sahadeo Singh

06.25.13  
Date

Exhibit

B-1



Exhibit

B-2



B18 (Official Form 18) (12/07)

DISCHARGE OF DEBTOR Page 1 of 2

## United States Bankruptcy Court

Eastern District of Pennsylvania

Case No. 13-10625-mdc

Chapter 7

In re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974

Social Security No.:

xxx-xx-2662

Employer's Tax I.D. No.:

### DISCHARGE OF DEBTOR

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#### IT IS ORDERED:

The debtor is granted a discharge under section 727 of title 11, United States Code, (the Bankruptcy Code).

BY THE COURT

Dated: 5/7/13

Magdeline D. Coleman  
United States Bankruptcy Judge

**SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION.**

Exhibit B-3



**Experian Healthcare**  
6450 Wedgwood Road  
Suite 100  
Maple Grove, MN 55311  
(1) 763 416 1000 T  
(1) 763 416 1099 F  
[www.experian.com](http://www.experian.com)

July 11, 2013

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974

Dear Sahadeo:

Thank you for contacting Search America, Inc. (Experian Healthcare) about the information that you are questioning regarding information from your credit report. Let me start by letting you know that Experian Healthcare is not in the business of making inquiries for unlawful reasons. Our clients have a permissible purpose to access information regarding their patients under Section 604 of the Fair Credit Reporting Act. We provide a service for our customers to locate information through our systems to help verify demographic data and understand financial positions for their consumers.

Note that the inquiries through our systems are soft inquiries that do not affect your credit score and you are the only one who is able to view these inquiries. Other organizations looking at your credit report are not able to see these inquiries. Our main clientele is within the healthcare industry, so if you or any of your dependents have been to a medical facility that utilizes our tools, this could be how this inquiry has appeared on your credit report.

If you would like more information or would like to talk to someone in our Customer Care team, please contact our Consumer Line at 763.416.1030. We can assist you with the use of our services; however if you have specific questions about the inquiries that are not associated with Experian Healthcare, we will need you to contact the Experian National Consumer Assistance Center directly at 888-397-3742.

If you would like to speak with me, you can reach me directly at 763.416.1010.

Sincerely,

A handwritten signature in black ink that reads "Susan M. Hanson".

Susan M. Hanson  
Compliance Officer  
Experian Healthcare  
[susan.hanson@experian.com](mailto:susan.hanson@experian.com)  
(1) 763 416 1010 T

Exhibit C

**Sahadeo Singh**  
**580 Sunnemeade Avenue**  
**Warminster, PA 18974**  
**215-758-1764**

Search America  
6450 Wedgewood Road, Suite 100  
Maple Grove, MN 55311

**Re. Sahadeo Singh SSN [REDACTED] DOB 1/29/1956**

To Whom it May Concern:

I would like to request a free copy of all information that your company has about me.

I would like to know that persons or business entities have obtained my information from your company in the last 12 months. To whom did you furnish my personal information in the last 12 months? I would like names, addresses and telephone numbers.

Enclosed please find a copy of my drivers license identification, and other documentation of my identity and my address.

**Please redact the first five digits of my Social Security number on my consumer report.**  
**Please do not print the first five digits of my Social Security number on my consumer report.**

Thank you.

Sincerely,

*Sahadeo Singh*  
Sahadeo Singh

07-11-13  
Date

Exhibit D-1

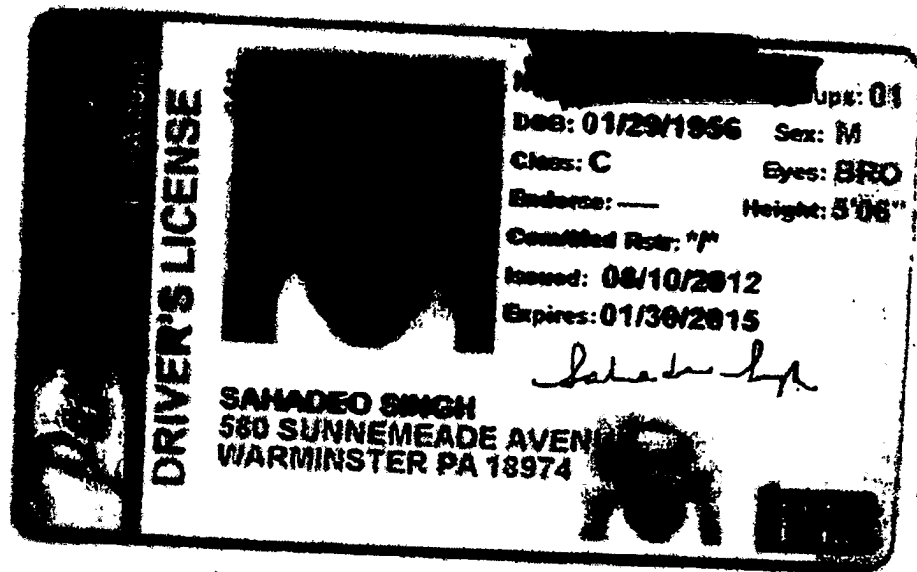


Exhibit D-2

B18 (Official Form 18) (12/07)

## United States Bankruptcy Court

Eastern District of Pennsylvania

Case No. 13-10625-mdc

Chapter 7

In re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974

Social Security No.:  
xxx-xx-2662

Employer's Tax I.D. No.:

### DISCHARGE OF DEBTOR

It appearing that the debtor is entitled to a discharge,

#### IT IS ORDERED:

The debtor is granted a discharge under section 727 of title 11, United States Code, (the Bankruptcy Code).

BY THE COURT

Dated: 5/7/13

Magdeline D. Coleman  
United States Bankruptcy Judge

**SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION.**

Exhibit D-3



**Experian Healthcare**

8450 Wedgwood Road  
Suite 100  
Maple Grove, MN 55311  
(1) 763 416 1000 T  
(1) 763 416 1099 F  
[www.experian.com](http://www.experian.com)

August 1, 2013

Sahadeo Singh  
580 Sunnemeade Avenue  
Warminster, PA 18974

Dear Sahadeo:

Thank you for contacting Search America, Inc. (Experian Healthcare) about the information that you are questioning regarding information from your credit report. Let me start by letting you know that Experian Healthcare is not in the business of making inquiries for unlawful reasons. Our clients have a permissible purpose to access information regarding their patients under Section 604 of the Fair Credit Reporting Act. We provide a service for our customers to locate information through our systems to help verify demographic data and understand financial positions for their consumers.

Note that the inquiries through our systems are soft inquiries that do not affect your credit score and you are the only one who is able to view these inquiries. Other organizations looking at your credit report are not able to see these inquiries. Our main clientele is within the healthcare industry, so if you or any of your dependents have been to a medical facility that utilizes our tools, this could be how this inquiry has appeared on your credit report.

If you would like more information or would like to talk to someone in our Customer Care team, please contact our Consumer Line at 763.416.1030. We can assist you with the use of our services; however if you have specific questions about the inquiries that are not associated with Experian Healthcare, we will need you to contact the Experian National Consumer Assistance Center directly at 888-397-3742.

If you would like to speak with me, you can reach me directly at 763.416.1010.

Sincerely,

A handwritten signature in black ink that reads "Susan M. Hanson".

Susan M. Hanson  
Compliance Officer  
Experian Healthcare  
[susan.hanson@experian.com](mailto:susan.hanson@experian.com)  
(1) 763 416 1010 T

Exhibit E

**Sahadeo Singh**  
**580 Sunnemeade Avenue**  
**Warminster, PA 18974**  
**215-758-1764**

**Experian Healthcare**  
**Attention: Compliance**  
**6450 Wedgewood Road, Suite 100**  
**Maple Grove, MN 55311**

**Re. Sahadeo Singh SSN: [REDACTED] DOB 1/29/1956**

**To Whom it May Concern:**

I would like to request a free copy of all information that your company has about me.

I would like to know that persons or business entities have obtained my information from your company in the last 12 months. To whom did you furnish my personal information in the last 12 months? I would like names, addresses and telephone numbers.

Furthermore, I noticed from my Experian consumer report that Search American accessed my consumer report for Abington Memorial Hospital. I would like the address and telephone number for Abington Memorial Hospital.

Enclosed please find a copy of my drivers license identification, and other documentation of my identity and my address.

**Please redact the first five digits of my Social Security number on my consumer report.**  
**Please do not print the first five digits of my Social Security number on my consumer report.**

Thank you.

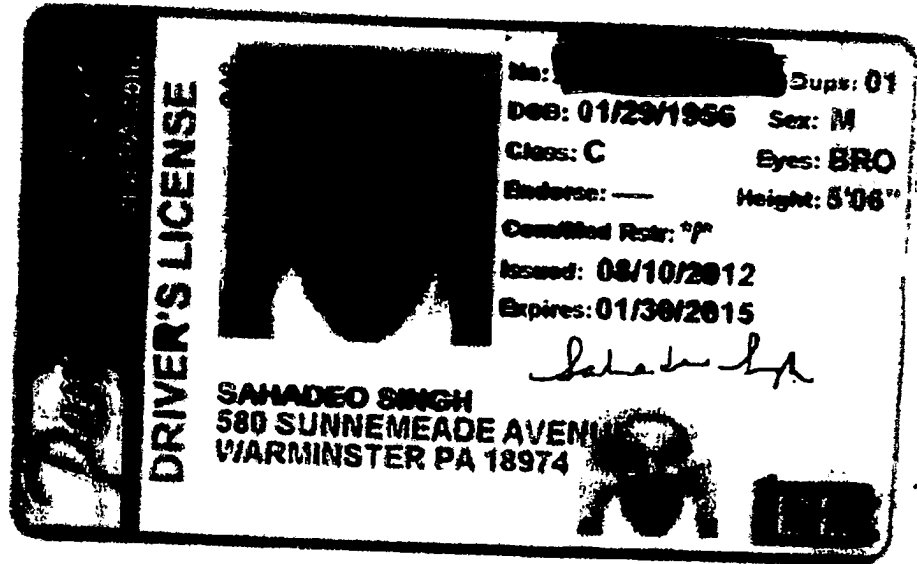
Sincerely,

Sahadeo Singh  
Sahadeo Singh

19th Aug. 2013  
Date

Exhibit

F 1



Exhibit

F-2



U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER			
Received From			
Sahadeo Singh			
580 Sunnemeade Avenue			
Warminster, PA 18974			
One piece of ordinary mail addressed to.			
Experian Healthcare			
Attention: Compliance			
6450 Wedgewood Road, Suite 100			
Maple Grove, MN 55311			

1000  
AUG 19 2013  
U.S. POSTAGE  
PAID  
LANSDALE, PA  
19446  
AUG 19, 13  
AMOUNT  
\$1.20  
000814-09

Exhibit

F-3

**Sahadeo Singh**  
**580 Sunnemeade Avenue**  
**Warminster, PA 18974**  
**215-758-1764**

Search America  
6450 Wedgewood Road, Suite 100  
Maple Grove, MN 55311

**Re. Sahadeo Singh SSN: [REDACTED] DOB [REDACTED]**

To Whom it May Concern:

I would like to request a free copy of all information that your company has about me.

I would like to know that persons or business entities have obtained my information from your company in the last 12 months. To whom did you furnish my personal information in the last 12 months? I would like names, addresses and telephone numbers.

Furthermore, I noticed from my Experian consumer report that Search American accessed my consumer report for Abington Memorial Hospital. I would like the address and telephone number for Abington Memorial Hospital.

Enclosed please find a copy of my drivers license identification, and other documentation of my identity and my address.

**Please redact the first five digits of my Social Security number on my consumer report.**  
**Please do not print the first five digits of my Social Security number on my consumer report.**

Thank you.

Sincerely,

*Sahadeo Singh*  
Sahadeo Singh

18th Aug 2013  
Date

Exhibit

G-1

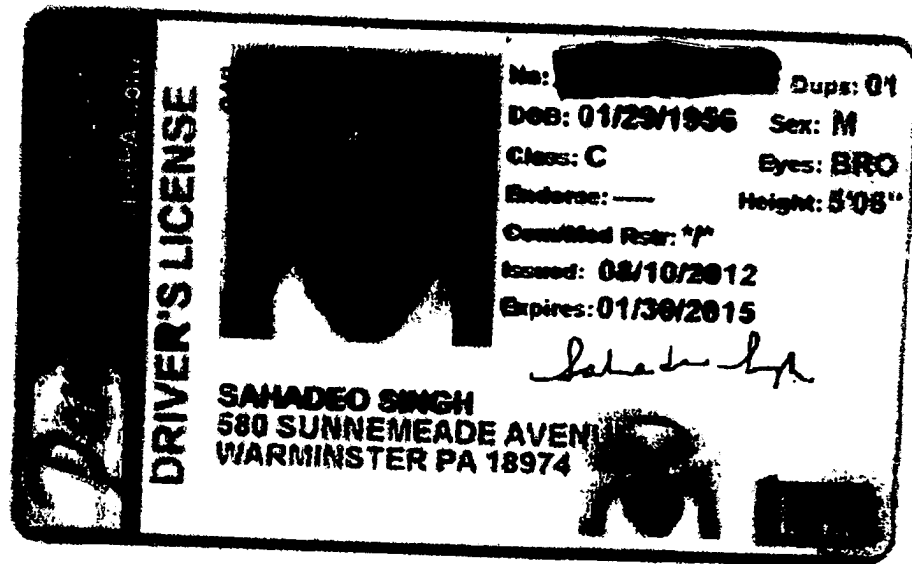


Exhibit G-2

U.S. POSTAL SERVICE **CERTIFICATE OF MAILING**  
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT  
PROVIDE FOR INSURANCE—POSTMASTER

Received From  
**Sahadeo Singh**  
**580 Sunnemeade Avenue**  
**Warminster, PA 18974**

One piece of ordinary mail addressed to.  
**Search America**  
**6450 Wedgewood Road, Suite 100**  
**Maple Grove, MN 55311**

100619446  
LANSDALE, PA 19446  
AUG 19 2013  
\$1.20  
0003161410967  
U.S. POSTAGE  
PAID  
LANSDALE, PA  
19446  
AUG 19 2013  
RHDLNT

U.S. POSTAL SERVICE

Exhibit

G-3

**Sahadeo Singh**  
**580 Sunnemeade Avenue**  
**Warminster, PA 18974**  
**215-758-1764**

Experian  
P.O. Box 2002  
Allen, TX 75013

Experian Healthcare  
Attention: Compliance  
6450 Wedgewood Road, Suite 100  
Maple Grove, MN 55311

Experian Healthcare  
Attention: Compliance  
6450 Wedgewood Road, Suite 100  
Maple Grove, MN 55311

Re. **Sahadeo Singh** SSN: [REDACTED] **DOB 1/29/1956**

To Whom it May Concern:

I would like answers.

Recently I noticed from my Experian consumer report that Search America / Experian Healthcare accessed my consumer report for Abington Memorial Hospital. See excerpt from my Experian consumer report showing that Abington Memorial Hospital received my Experian consumer report.

I would like the address and telephone number for Abington Memorial Hospital.

Please see copy of my identification enclosed.

**Please redact the first 5 digits of my Social Security Number on my consumer report.**

Sincerely,

*Sahadeo Singh*  
Sahadeo Singh

09.21.13  
Date

Exhibit H-1

Prepared for: SAHADEO SINGH  
 Date: July 05, 2013  
 Report number: 1829-8707-71

Page 32 of 38

## Record of requests for your credit history

We make your credit history available to your current and prospective creditors and employers as allowed by law. Experian may list these inquiries for up to two years.

### Inquiries shared with others

The section below lists all of the companies that have requested your credit information as a result of an action you took, such as applying for credit or financing or as a result of a collection. The inquiries in this section are shared with companies that receive your credit history.

Examples of inquiries shared with others include:

- a real estate loan
- a home mortgage loan
- an auto loan
- an application for credit

### WELLS FARGO BANK WEST NA

PO BOX 31557

BILLINGS MT 59107

No phone number available

Address identification number:

0274023778

Date

Sep 4, 2012

Reason

Unspecified. This inquiry is scheduled to continue on record until Oct 2014.

### WELLS FARGO BANK WEST NA

No phone number available

Address identification number:

0274023778

Date

Jun 11, 2012

Reason

Unspecified. This inquiry is scheduled to continue on record until Jul 2014.

### WELLS FARGO BANK WEST NA

No phone number available

Address identification number:

0274023778

Date

Jan 21, 2012

Reason

Unspecified. This inquiry is scheduled to continue on record until Feb 2014.

### CBA/MORTGAGE SERVICES

3000 LEADENHALL RD

MOUNT LAUREL NJ 08054

No phone number available

Address identification number:

0274023778

Date

Dec 29, 2011

Reason

Mortgage. This inquiry is scheduled to continue on record until Jan 2014.

### VERIZON COMMUNICATION E

PO BOX 48

LAKELAND FL 33802

No phone number available

Address identification number:

0039254607

Date

Oct 26, 2011

Reason

Utility company. This inquiry is scheduled to continue on record until Nov 2013.

### NATIONWIDE CREDIT INC

2002 SUMMIT BLVD STE 800

ATLANTA GA 30319

No phone number available

Address identification number:

0753293728

Date

Jul 26, 2011

Reason

Unspecified. This inquiry is scheduled to continue on record until Aug 2013.

### Inquiries shared only with you

You may not have initiated the following inquiries, so you may not recognize each source. We report these requests to you only as a record of activities, and we do not include any of these requests on credit reports to others.

We offer credit information about you to those with a permissible purpose, such as:

- other creditors who want to offer you preapproved credit;
- an employer who wishes to extend an offer of employment;
- a potential investor in assessing the risk of a current obligation;
- Experian Consumer Assistance to process a report for you;
- your current creditors to monitor your accounts (date listed may reflect only the most recent request).

These inquiries DO NOT affect your credit score.

SEARCH AMERICA 6450 WEDGWOOD RD N STE 100 MAPLE GROVE MN 55311

No phone number available

On behalf of ABINGTON MEMORIAL HOSPITAL for 30

Date of inquiry: May 14, 2013; Feb 27, 2013; Apr 04, 2012

RESURGENT CAPITAL SERVIC PO BOX 10497 GREENVILLE SC 29603

No phone number available

Date of inquiry: Apr 22, 2013

EXPERIAN PO BOX 2002 ALLEN TX 75013

No phone number available

Date of inquiry: Apr 04, 2013; May 02, 2011

Exhibit H-2

0159010401



Prepared for: SAHADEO SINGH  
 Date: November 25, 2013  
 Report number: 3314-7145-82

Page 1 of 36

**Dear SAHADEO SINGH,**

*To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.*

If you question the results of our dispute process, then you may want to contact the furnisher of information directly or review the original information in the public record. Please refer to your original personal credit report for the

furnisher or public records office name, address, and phone number (if available).

By federal law, your personal credit report must list all organizations that have requested your credit history. In accordance with the Fair Credit Reporting Act, entities who have certified to Experian that they have a permissible purpose may inquire about credit information. For example, organizations that have granted you credit or with whom you have applied for credit, or entities collecting on transactions that you initiated or on judgments rendered against you, are permitted to make inquiries on your credit report. Requests for your credit history remain on the personal credit report for at least two years.

Inquiries from credit grantors who request your credit information as part of your application for credit will display under the heading "Inquiries shared with others" on your personal credit report. These inquiries display on your credit report when it is accessed by others with a permissible purpose. These inquiries may affect your credit score.

Other inquiries for your credit information are considered "soft" inquiries and do not affect your credit score. Some examples are: your current creditors to monitor your accounts; other creditors who want to offer you preapproved credit; an employer who wishes to extend an offer of employment; and a potential investor assessing the risk of a current credit obligation. These inquiries appear under the heading "Inquiries shared only with you" on your personal credit report. You will not receive this explanation again if you dispute this same item within the next 30 days.

Sincerely,

Experian  
 NCAC  
 P.O. Box 2002  
 Allen TX 75013

PO Box 9701  
 Allen, TX 75013



0000302 05 MB 1 537 \*\*AUTO 6 0 7283 18974-465180 \_ -C03-P00302-1  
 SAHADEO SINGH  
 580 SUNNEMEADE AVE  
 WARMINSTER PA 18974-4651



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EXHIBIT I

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Sahadeo Singh	:	
580 Sunnemeade Avenue	:	
Warminster, PA 18974	:	
	:	
Plaintiff	:	
Vs.	:	Civil Action-Law
Experian Information Solutions, Inc.	:	
475 Anton Blvd.	:	
Costa Mesa, CA, 92626	:	
and	:	
Experian Information Solutions, Inc.,	:	13-cv-07651
5 Century Drive	:	
Parispany, NJ 07054,	:	
and	:	
Search America, Inc.	:	
6450 Wedgewood Road, Suite 100	:	
Maple Grove, MN 55311	:	
and	:	
X,Y,Z Corporations	:	
	:	
Defendant(s)	:	

**CERTIFICATE OF SERVICE**

I, Vicki Piontek, Esquire affirm that I served a true and correct copy of the attached AMENDED COMPLAINT on the following parties at the following addresses.

JONES DAY  
DAVID M. BELCZYK, ESQUIRE  
500 GRANT STREET, SUITE 4500  
PITTSBURGH, PA 15219

KAPLIN STEWART MELOFF REITER & STEIN PC  
MOHAMMAD A. GHIASUDDIN, ESQUIRE  
910 HARVEST DRIVE  
P.O BOX 3037  
BLUE BELL, PA 19422-0765

<u>Vicki Piontek</u>	<u>1-1-2014</u>
Vicki Piontek, Esquire	Date
Attorney for Plaintiff	
951 Allentown Road	
Lansdale, PA 19446	
877-737-8617	
palaw@justice.com	
Fax: 866-408-6735	